

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter)	
)	
Federal Communications Commission)	
)	CC Docket 96-45
Universal Service Support Mechanisms)	
For Non-Rural Carriers)	WC Docket 05-337
)	

COMMENTS OF THE IOWA UTILITIES BOARD

The Iowa Utilities Board (Board) submits these comments in response to the Public Notice inviting comments for its review of Universal Service support mechanisms for non-rural carriers.

On December 9, 2005, the FCC released a Notice of Proposed Rulemaking (NPRM) concerning High-Cost Universal Service Support. The NPRM was the result of the decision handed down by the United States Court of Appeals for the Tenth Circuit. The court directed the FCC on remand to articulate a definition of “sufficient” that appropriately considers the range of principles in 47 U.S.C. § 254 and to define “reasonably comparable” in a manner that comports with its duty to preserve and advance universal service. The Board has not previously filed comments regarding these issues and does not address them in these comments.

In the current NPRM, the FCC also seeks comment on the support mechanism for non-rural carriers. Specifically, they seek comments on the

universal aspects of the comprehensive plan proposed by the National Association of Regulatory Utility Commissioners (NARUC) Task Force in CC Docket No. 01-92, *Developing a Unified Inter-carrier Compensation Regime*. The NARUC Task Force plan proposes combining the support contained in all of the federal high-cost support mechanisms and giving the states discretion, within guidelines set by the Commission, to determine how the support should be distributed among carriers serving the state.

The Board has previously filed comments that supported the proposal submitted by the NARUC Task Force. Specifically, the Board stated that universal service support should be technology-neutral so that a carrier is not penalized for converting to new, cost-efficient, advanced technologies. Universal service support should be based on the characteristic of the exchange and not the carrier, which would allow support to go to Qwest Corporation, Iowa Telecommunications Service, Inc., d/b/a Iowa Telecom, and Frontier Communications of Iowa, which they do not receive today. Finally, the contribution base should be expanded by using connections, bandwidth, or telephone numbers to provide support for the mechanisms outlined in the NARUC Task Force proposal.

CONCLUSION

The Iowa Utilities Board respectfully submits these comments for the Federal Communication Commission's consideration regarding its review of the NARUC Task Force's proposal regarding universal service.

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Respectfully submitted,

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